

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

In Re:)	Case No:	17-24339
Christopher Bucon)		
Jennifer M Bucon)	Chapter:	Chapter 13
Debtor(s),)	Judge:	LaShonda A. Hunt
)		

NOTICE OF MOTION

To: See attached list

PLEASE TAKE NOTICE that on July 15, 2022 at 10:15 am, I will appear electronically before the Honorable LaShonda A. Hunt or any judge sitting in that judge's place, and present the Debtors' MOTION FOR DETERMINATION OF FINAL CURE AND PAYMENT, a copy of which is attached.

This motion will be presented and heard electronically using Zoom for Government.

No personal appearance in court is necessary or permitted. To appear and be heard on the motion, you must do the following:

To appear by video, use this link: <https://www.zoomgov.com/join>. Then enter the meeting ID and password.

To appear by telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and password.

Meeting ID and passcode. The meeting ID for this hearing is **161 165 5696** and the passcode is **7490911**. Additional information can be found on Judge Hunt's webpage on the court's website:
<https://www.ilnb.uscourts.gov/content/judge-lashonda-hunt>.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

Christoper & Jennifer Bucon
By: Briana Czajka
Attorney for the Debtor
Geraci Law L.L.C.
55 E. Monroe Street #3400
Chicago, Illinois 60603
(Ph): 312.332.1800
(Fax): 877.247.1960

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CERTIFICATE OF SERVICE

I, Anna Morowczynski, declare under penalty of perjury under the laws of the United States of America that I served a copy of this notice and the attached motion on each entity shown on the attached list at the address shown and by the method indicated on the list on June 27, 2022 before 5:30 pm.

/s/ Anna Morowczynski
Anna Morowczynski

SERVICE LIST

VIA CM/ECF

Glenn B. Stearns, Chapter 13 Trustee 801 Warrenville Rd., Suite 650 Lisle, IL 60532

Patrick Layng, United States Trustee Region 11, 219 S. Dearborn St. Suite 873 Chicago, IL 60604

U.S. Bank Trust National Association, not in its individual capacity but solely as trustee for BKPL-EG Series N Trust c/o Molly Simons, Sotille and Barile, 394 Wards Corner Road, Suite 180, Loveland, OH 45140

VIA USPS

Christopher & Jennifer Bucon, 8412 Hanbury Ct. Joliet, IL 60431

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MOTION FOR DETERMINATION OF FINAL CURE AND PAYMENT

NOW COME the Debtors, Christopher & Jennifer Bucon (the "Debtors"), by and through their attorneys, Geraci Law L.L.C., to present their **MOTION FOR DETERMINATION OF FINAL CURE AND PAYMENT**, and state as follows:

1. This Court has jurisdiction pursuant to 11 U.S.C. 1334 and this is a "core proceeding" under 28 U.S.C. 157(b).
2. This motion is brought pursuant to Federal Rule of Bankruptcy Procedure 3002.1(h).
3. U.S. Bank Trust National Association, not in its individual capacity but solely as trustee for BKPL-EG Series N Trust ("creditor") filed its response to the trustee's Notice of Final Cure Payment on 6/8/2020.
4. Counsel for debtors reached out to counsel for creditor alerting them that the response was inaccurate and providing proof of payments that the debtors made, including, specifically, payments on or about 11/29/2021 and 4/1/2022, which were not reflected on the payment history.

5. Counsel for creditor provided counsel for debtor with an updated payment history today, which still omits those payments.

6. Debtors allege that they are current on postpetition mortgage payments less the \$900 in postpetition fees and costs, leaving an outstanding balance of \$900.

WHEREFORE, the Debtors, Christopher & Jennifer Bucon, pray that this Court enter an order determining that the debtors are current on their postpetition ongoing mortgage payments, and for such further additional relief that this Court may deem just and proper.

/s/ Briana Marie Czajka
Briana Marie Czajka

Attorneys for the Debtor(s)

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